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Attorneys for Defendant Derek Palaschuk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE LONGTOP FINANCIAL
TECHNOLOGIES LIMITED SECURITIES
LITIGATION

Civil Action No. 11-cv-03658-SAS

**NOTICE OF MOTION AND MOTION OF DEFENDANT DEREK PALASCHUK TO
DISMISS PLAINTIFFS' CONSOLIDATED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE THAT Defendant Derek Palaschuk will move this Court, on a date and at such time as may be designated by the Court, at 500 Pearl Street, New York, NY 10007, for entry of an order dismissing the Consolidated Class Action Complaint ("CAC") filed by Lead Plaintiffs Danske Invest Management A/S and Pension Funds of Local No. One, I.A.T.S.E. ("Plaintiffs"), for failure to state a claim under Federal Rule of Civil Procedure 12(b)(6). Specifically, Defendant Palaschuk intends to demonstrate that the Complaint does not

plead the elements of scienter, falsity, or materiality under Section 10(b) of the Exchange Act with the degree of specificity required by Federal Rule of Civil Procedure 9(b) and the Private Securities Litigation Reform Act.

This motion is based upon this Notice of Motion, the accompanying Memorandum of Law, the Declaration of Royale Price and the exhibits attached thereto, the pleadings, and any other written or oral argument as may be permitted before the Court.

WHEREFORE, Defendant Derek Palaschuk respectfully requests that the Court dismiss the CAC's claims against him.

DATED: April 23, 2012

Respectfully submitted,

GREENBERG TRAURIG, LLP

By /s/ Paul R. Bessette

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CERTIFICATE REGARDING PRE-MOTION LETTER

Pursuant to Judge Scheindlin's Individual Rule IV.B., I hereby certify that on April 11, 2012, I emailed a letter to Counsel for Plaintiffs regarding Defendant Derek Palaschuk's intention to file a motion to dismiss the Consolidated Class Action Complaint. In subsequent communications with Counsel for Plaintiffs, I was unable to resolve the issues that form the bases for this motion.

/s/Michael J. Biles

Michael J. Biles

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 23, 2012, I electronically filed the foregoing Notice of Motion and Motion of Defendant Derek Palaschuk to Dismiss Plaintiffs' Consolidated Class Action Complaint with the Clerk of Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record who have consented to electronic notification. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to all non-CM/ECF participants.

/s/Royale Price

Royale Price